



# Federal Aviation Administration

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## MMEL Policy Letter 81 Revision 1

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Date: August 15, 1997

To: All Region Flight Standards Division Managers  
All Aircraft Evaluation Group Managers

From: Manager, Air Transportation Division, AFS-200

Reply To: Manager, Technical Programs Branch, AFS-260  
Attn Of:

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**Subject:** MEL CDL Operator Procedures

**MMEL CODE:** 00 (GENERAL)

**REFERENCE:** PL-81, dated 03/26/1996

**PURPOSE:**

This policy letter is to clarify that an operator may elect to apply Configuration Deviation Lists (CDL) procedures in the same manner as established for the operator's Minimum Equipment List (MEL) for informing the flight crew and other appropriate personnel of the equipment items and limitations associated with missing equipment.

**DISCUSSION:**

Revision 1  
Reformats Policy Letter 81 with no change to policy.

Revision Original

A potential problem with the interpretation of MEL and CDL requirements exists. This is in the interpretation of differences in the text of the Master Minimum Equipment List (MMEL), preamble, limitation page, the CDL limitations page, and as well as differences between individual CDL limitation pages of different aircraft types. Depending on the quantity of aircraft type(s) in an operators fleet, this interpretation of differences could lead to two, three, or more non-standard procedures for MELs and CDLs.

Examples follow:

1. The MMEL preamble states "Suitable conditions and limitations in the form of placards, maintenance procedures, crew operating procedures and other restrictions as necessary are specified in the MEL to ensure that an acceptable level of safety is maintained."

MEL Definition 4 requires each inoperative item to be placarded "to inform and remind the crewmembers and maintenance personnel of the equipment condition." Definition 4 also contains a note indicating that "to the extent practical, placards should be located adjacent to the control or indicator for the item affected; however, unless otherwise specified, placard wording and location will be determined by the operator."

2. Manufacturer "A" CDL states "The associated limitations must be listed on a placard affixed in the cockpit in clear view of the pilot."

3. Manufacturer "B" CDL states "The associated limitations must be listed on a placard affixed in the cockpit in clear view of the pilot-in-command and other appropriate crew member(s)."

4. Manufacturer "C" CDL states "The associated limitations must be listed on a placard affixed in the flight deck on the pilots instrument panel in clear view of both pilots."

Given the above examples, an operator utilizing all three aircraft types could be faced with the following non-standard procedures:

- \* MELs --- the placard may or may not contain associated limitations as these may be contained elsewhere as determined by the operator (i.e. in the Special Procedures, inside in the log book cover, on the log book cover, etc.). The placards may be affixed by the control or indicator, or some other location.

- \* Manufacturer "A" the placard would contain associated limitations. The placard would be affixed somewhere in the cockpit in clear view of the pilot, though not necessarily on the instrument panel or in view of other crew members.

- \* Manufacturer "B" the placard would contain associated limitations. The placard would be affixed in the cockpit in clear view of the pilot and other appropriate crew members, though not necessarily on the instrument panel.

- \* Manufacturer "C" the placard would contain associated limitations. The placard would be affixed on the instrument panel on the flight deck in clear view of both pilots. Additional limitations whether required by an inoperative item of the MEL, or a missing secondary part of the CDL, are equally important. Requiring operators to use non-standard procedures to address these limitations when similar or identical procedures can be used, may cause some confusion and possible negative results.

#### **POLICY:**

This policy provides a means for operators to establish a standard procedure for advising its flight crewmembers and concerned maintenance personnel of an airplane's status when a flight is to depart with a missing part on the CDL and/or inoperative equipment on the MEL along with the conditions and limitations that apply. The intent here is to provide the operators with an option to standardize, simplify all or part of its procedures for meeting the requirements of advising all concerned of any CDL and MEL limitations that apply to a particular flight. Through service experience, it has been demonstrated that the operators MEL procedures are capable of addressing aircraft operations with MEL status and limitations. These same MEL procedures may also be used for addressing an aircraft's CDL status and limitations. This includes operator procedures to provide the flight crew with further elaboration of the item by application in the airplane flight log and dispatch papers.

Regardless of the operator's procedures, this policy does not alleviate the operator from informing all applicable personnel of the associated limitations as contained in the CDL appendix to the Aircraft Flight Manual. Principal operations inspectors are to be guided by this policy in their approval of assigned operators/air carrier procedures for operations in accordance with CDL requirements.

Flight Operations Evaluations Board Chairmen should review MMELs for necessary action and apply this policy to affected MMELs through the normal Flight Operations Evaluation Board process. Principal inspectors may affect changes to the MEL in accordance with this policy letter.

John Duncan, Manager  
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Reformatted 12/04/2010